

Exhibit 4—E-mail Exchange Between Mr. Coyne's Counsel and Defense Counsel

McHale, Kevin J.

From: Dolente, Daniel E.
Sent: Monday, March 1, 2021 1:39 PM
To: 'Cavalier, Jonathan'; Pasquarello, Michele; Walton, David; Benson, Leigh Ann
Cc: McHale, Kevin J.; Walker, Nancy D.; 'seth@dereksmithlaw.com'; 'SGold@DiscrimLaw.net'; 'BRieser@DiscrimLaw.net'; 'tgreenberg@discrimlaw.net'
Subject: RE: Barbounis, Lisa v. Middle East Forum, et al (42432.00101)

Jon: In light of your MSJ deadline, extension granted. But I do point out that is yet another reason why the subpoena should be withdrawn.

Please give me a call tomorrow before end of day. Cell is 610-999-9860.

Talk then,
Dan



Daniel E. Dolente

Attorney at Law

2000 Market Street, Suite 2300, Philadelphia, PA 19103

Direct: (267) 519-6574 | Main: (215) 575-2600 | Fax: (215) 575-0856

[bio](#) | [e-mail](#) | [website](#)

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From: Cavalier, Jonathan <JCavalier@cozen.com>
Sent: Monday, March 1, 2021 12:59 PM
To: Pasquarello, Michele <MMPasquarello@MDWCG.com>; Walton, David <DWalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>
Cc: Dolente, Daniel E. <DEDolente@MDWCG.com>; McHale, Kevin J. <KJMcHale@MDWCG.com>; Walker, Nancy D. <NDWalker@MDWCG.com>; 'seth@dereksmithlaw.com' <seth@dereksmithlaw.com>; 'SGold@DiscrimLaw.net' <SGold@DiscrimLaw.net>; 'BRieser@DiscrimLaw.net' <BRieser@DiscrimLaw.net>; 'tgreenberg@discrimlaw.net' <tgreenberg@discrimlaw.net>
Subject: RE: Barbounis, Lisa v. Middle East Forum, et al (42432.00101)

Daniel:

I will review your letter and the objections that you raised, would be happy to discuss them with you, as you suggest. I cannot, however, comply with your end-of-today deadline, which four hours from now. Since you have reviewed the relevant docket in this matter, I am sure you can understand why. I can likely get back to you by tomorrow.

Please let me know if that works, or if you will be filing the motions you referenced. If the latter, please attach this email to your submission to the court.

Thanks,
Jon Cavalier



Jonathan R. Cavalier
Member | Cozen O'Connor
One Liberty Place, 1650 Market Street Suite 2800 | Philadelphia, PA 19103
P: 215-665-2776 F: 215-701-2112
[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)

From: Pasquarello, Michele <MMPasquarello@MDWCG.com>
Sent: Monday, March 1, 2021 12:47 PM
To: Cavalier, Jonathan <JCavalier@cozen.com>; Walton, David <DWalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>
Cc: Dolente, Daniel E. <DEDolente@MDWCG.com>; McHale, Kevin J. <KJMcHale@MDWCG.com>; Walker, Nancy D. <NDWalker@MDWCG.com>; 'seth@dereksmithlaw.com' <seth@dereksmithlaw.com>; 'SGold@DiscrimLaw.net' <SGold@DiscrimLaw.net>; 'BRieser@DiscrimLaw.net' <BRieser@DiscrimLaw.net>; 'tgreenberg@discrimlaw.net' <tgreenberg@discrimlaw.net>
Subject: Barbounis, Lisa v. Middle East Forum, et al (42432.00101)

****EXTERNAL SENDER****

Good Afternoon Mr. Cavlier,

Attached please find correspondence in the above-captioned matter regarding Objections and Responses of Non-Party, Ryan Coyne, to the Rule 45 Subpoena.

We would kindly ask that all parties please confirm receipt of this e-mail and its attachments.

Thank you for your attention to this matter.



Michele Pasquarello
Administrative Assistant
2000 Market Street, Suite 2300, Philadelphia, PA 19103
Direct: (267) 787-8012 | Main: (215) 575-2600 | Fax: (215) 575-0856
[e-mail](#) | [website](#)

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